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November 14, 2022

BY ECF

Hon. Cheryl L. Pollak
United States District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Cc: Hon. Frederic Block, U.S.D.J.
Counsel of Record (via ECF)

Re: Jeanne L. LaFrantz v. St. Mary's Roman Catholic Church, et al.,
Docket No. 21-cv-04920-FB-CLP

Dear Judge Pollak:

We represent Plaintiff Jeanne LaFrantz (“Plaintiff” or “Jeanne”) in the above captioned proceeding, brought pursuant to the New York Child Victims Act (L 2019, ch 11) (“CVA”). Jeanne alleges she was sexually abused by John F. Campbell (“Father Campbell”)—a priest under the Diocese of Brooklyn—for six years, from approximately 1960 to 1966, beginning when Jeanne was a 10-year-old student and minor parishioner at St. Mary’s Roman Catholic Church (“St. Mary’s”). *See* dkt. # 28 [Plaintiff’s First Amended Complaint (“FAC”)].

As Plaintiff indicated in her filing on November 3, 2022 (dkt. 47), Defendant Roman Catholic Diocese of Brooklyn (“Diocese of Brooklyn”) has continued to file supplemental responses and engaged in responsive pleading. Despite this, Plaintiff has yet to receive one responsive document from Defendants.

Contrary to what Defendant Diocese of Brooklyn stated in its status report dated November 14, 2022 (dkt. 48), Jeanne has not indicated Plaintiff’s discovery production is complete; Jeanne has produced all responsive documents in her possession at this time. Jeanne is willing to complete and sign any authorizations from Defendants that will lead to discoverable information. But Defendants have yet to send or indicate to Plaintiff which authorizations they request she complete and sign.

Last Thursday, November 10, 2022, Mr. Randall Morrison indicated to Plaintiff’s counsel Father Campbell’s “clergy file” is in the possession of Kelly Drye & Warren LLP and Plaintiff could anticipate receiving the file early this week. At no time did Defendants’ counsel indicate the parties needed to enter a protective order before Plaintiff received this production. As such, Plaintiff’s counsel expressed confusion as to why Defendants’ counsel requested the parties enter into a protective order after Plaintiff produced all responsive documents in her possession, and,

the deadline for the parties to produce responsive documents was several months ago—August 11, 2022—pursuant to the Court’s Minute Entry on April 13, 2022.

At this time, Plaintiff seeks discovery as soon as possible and to conserve judicial resources. To streamline issues to discuss with the Court on Tuesday, November 22, 2022, Plaintiff has proposed the following plan to Defendants’ counsel:

- Defendants send Plaintiff a proposed protective order to review by Wednesday, November 16, 2022—if the protective order mirrors that agreed to by the parties in *Guerriero v. Diocese of Brooklyn et al.* (1:21-cv-04923-MKB-JRC) proceeding in the Eastern District of New York before Chief Judge Brodie and Judge Cho, Plaintiff will consent; assuming the parties agree, Defendants then file the parties’ proposed protective order by Thursday, November 17, 2022.
- Defendants send Plaintiff any authorizations they seek Plaintiff’s signature on by Friday, November 18, 2022; Plaintiff will complete and sign authorizations, so long as they are likely to lead to discoverable information, by Monday, November 21, 2022.
- If the Court has granted the parties’ protective order, Defendants produce all discovery in their possession—namely Father Campbell’s “clergy file” and Plaintiff’s educational records—by Monday, November 21, 2022.

Respectfully Submitted,



Ashley Pileika
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